

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Christine Bennett : CHAPTER 13
Debtor : NO. 19-11414amc

MOTION TO VACATE ORDER GRANTING RELIEF AND REINSTATE STAY

Debtor, Christine Bennett, by her counsel, Sharon S. Masters, Esq., hereby requests the Court vacate the May 25, 2022 Order granting Relief from Stay and reinstate the automatic stay in this case, and in support thereof aver as follows:

Debtors filed the instant case on 3/7/2019. The case was confirmed on 10/16/2019.

Creditor filed a COD of stipulation on 4/19/2022; Debtor filed an objection on 4/20/2022. Based on negotiations with Creditor, Debtor withdrew the Objection on 5/25/2022 and Creditor was granted Relief from Automatic Stay.

3. Despite continued negotiation over one missed payment, Creditor eventually decided not to enter into a Stipulation reinstating stay; therefore, Debtor has filed this Motion.

4. Debtor will pay the post-petition arrears to Creditor upon the Court's grant of this Motion.

5 This case is more than 3 years old; if Debtor has to refile, this will be prejudicial to Debtor and Creditor and a waste of time and money for Debtor, Creditor, and the Court. Moreover, Debtor is prejudiced by being exposed to sheriff's sale if this Motion is not

granted.

6. Debtor will be severely prejudiced by the dismissal of this case, whereas creditors will not be prejudiced by the reinstatement of the case.

WHEREFORE, Debtors respectfully request the Court grant the Motion to Vacate its May 25, 2022 Order granting Relief from Stay and reinstate the stay upon Debtor's payment of post-petition arrears in full to Creditor at the hearing hereon.

Respectfully submitted,

/s/ Sharon S. Masters, Esq.

Sharon S. Masters, Esq.

Counsel for Debtor(s)

Dated: 7/6/2022